



Clergy Personal Files Privacy Notice

Using your personal information

This notice explains how the information about you which I hold in your personal file is used, managed and your rights with respect to that data.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in my possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the “GDPR”) and the Data Protection Act 2018, (the “DPA 2018”)

Who am I?

As Bishop of Exeter I am the data controller. This means I decide how your personal data is processed and for what purposes.

How do I process your personal data?

I comply with my obligations under the GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

I use your personal data for the following purposes: -

To exercise my legal and pastoral responsibilities as your diocesan bishop. In addition to my general oversight of your ministry, I am responsible for assessing your qualifications and suitability for any particular office or ministry within the diocese, and for making appropriate arrangements for your ministerial development (including ministerial development review).

What is the legal basis for processing your personal data?

Processing of the personal data in relation to clergy personal files is necessary for the purposes of legitimate interests in accordance with my responsibilities under the Canons, including my general responsibilities as chief pastor of the diocese and in

order to be able to develop, support, administer, regulate and manage clergy through their ministry. In so far as any personal data relates to “special categories of personal data” or criminal conviction or offence data the processing is a legitimate activity in order to manage and administer internal functions in relation to membership and/or those with whom I have regular contact. It is not shared externally outside the institutional bodies that comprise the Church of England without your consent.

The exception to this is the provision of Episcopal References and Clergy Current Status Letters (“CCSL”). Episcopal References and CCSLs are processed on the basis that it is a legitimate interest as established by the Promoting a Safer Church House of Bishops Policy Statement (2017)¹. However, in so far as the personal data contained within the Episcopal Reference and CCSL relates to “special categories of personal data” and criminal conviction and offence data, this will be processed on the basis that it is necessary for reasons of substantial public interest on the basis of UK law. The Episcopal Reference and CCSL will be disclosed both for posts within the Church of England and externally, where you have applied for a ministerial post in another diocese or a church outside the Church of England and is done so in order to protect members of the public from harm, including dishonesty, malpractice and other seriously improper conduct or safeguarding purposes as established by the Safer Recruitment: Practice Guidance (2016)².

Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only when necessary with institutional bodies that comprise the Church of England for the purposes of administrative functions in connection with your role. If I wish to share your personal data outside the Church of England, then I will always seek your consent first.

How long do I keep your personal data?

I keep your personal data for no longer than reasonably necessary for the periods and purposes as set out in the attached retention table.

Your rights and your personal data

Unless subject to an exemption under the GDPR or DPA 2018, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which the Bishop holds about you;
- The right to request that the Bishop corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the Bishop to retain such data;

¹ <https://www.churchofengland.org/sites/default/files/2017-12/PromotingSaferChurchWeb.pdf>

² https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer_recruitment_practice_guidance_2016.pdf

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the Information Commissioners Office.

Further processing

If I wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then I will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, I will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries or complaints please contact the Revd Preb Graham Stones, Chaplain to the Bishop of Exeter, The Palace Gatehouse, Palace Gate, Exeter, EX1 1HX, 01392 272362. bishops.chaplain@exeter.anglican.org.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

+Robert Exon
The Rt Revd Robert Atwell, Bishop of Exeter